

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGIN ENTERPRISES LIMITED, LTD. :

Plaintiff, :

-against- :

VIRGIN BEAUTY INDUSTRIES LTD., et al., :

Defendants. :

ECF CASE

07 Civ. 3340 (RJH)

NOTICE OF MOTION

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PLEASE TAKE NOTICE that upon the Amended Complaint, the Clerk's Certificate of Default as to defendant Virgin Beauty Industries Ltd, the Clerk's Certificate of Default as to defendant Adefolorunsho Technical Enterprises Limited, the Declaration of James W. Dabney, sworn to October 12, 2007, and upon all other pleadings and papers filed in this action, plaintiff Virgin Enterprises Ltd. ("VEL") will move this Court, The Honorable Richard J. Holwell, United States District Judge, at Room 17B, United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, on the 31st day of October at 9:30 a.m., or as soon thereafter or counsel can be heard, for an Order pursuant to Rules 55(b) and 65(d) of the Federal Rules of Civil Procedure granting judgment by default against defendants Virgin Beauty Industries Ltd. and Adefolorunsho Technical Enterprises Limited for failure to plead or otherwise defend the above-captioned action, and awarding permanent injunctive relief restraining defendants Virgin Beauty Industries Ltd., Adefolorunsho Technical Enterprises Limited, their officers, agents servants, employees, and attorneys, and all distributors or other persons acting in concert or

participation with them who receive actual notice of the proposed Final Judgment and Permanent Injunction Order by personal service or otherwise, from advertising, marketing, selling offering for sale, importing, or distributing any VIRGIN “Hair Fertilizer” product or using VIRGIN as a purported designation of the origin of “hair fertilizer” or any other hair or beauty care product made or distributed by defendants Virgin Beauty Industries Ltd. or Adefolorunsho Technical Enterprises Limited.

Dated: New York, New York
October 12, 2007

FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP

By s/James W. Dabney
James W. Dabney
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New York, New York 10004-1980
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Attorneys for Plaintiff
Virgin Enterprises Limited

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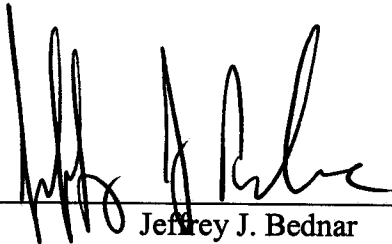
**CERTIFICATE OF
SERVICE**

I HEREBY CERTIFY pursuant to 28 U.S.C. § 1746 that on this 12th day of October 2007, I caused true copies of the attached Notice of Motion and Declaration of James W. Dabney to be served by Federal Express upon:

Virgin Beauty Industries Ltd.
Plot 9 Gboyega Ijaodola Drive
Sango-Otta
Ogun State, Nigeria

Adefolorunsho Technical Enterprises Limited
Plot 9 Gboyega Ijaodola Drive
Sango-Otta
Ogun State, Nigeria

Dated: New York, New York
October 12, 2007



Jeffrey J. Bednar
Paralegal